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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Estados Unidos Mexicanos,

Plaintiff

vs.

Diamondback Shooting Sports, Inc.,
et al.,

Defendants

**STIPULATION RE: PROPOSED
SECOND AMENDED SCHEDULING
ORDER**

NO. 4:22-cv-00472-TUC-RM

The Parties, by and through counsel undersigned, hereby propose, subject to the Court's approval, the following Second Amended Scheduling Order.

On October 22, 2025, the Court entered an Order ruling on various discovery motions (Doc. 165). Pursuant to that Order and consistent with the previous Amended Scheduling Order entered on March 24, 2025 (Doc. 117), the Parties propose the following updated schedule and deadlines for this matter:

EVENT	PROPOSED DEADLINE
Deadline to Complete Fact Discovery	October 22, 2026

Deadline for Plaintiff to serve affirmative expert reports	December 21, 2026
Deadline for Defendants' expert reports	February 19, 2027
Reply/rebuttal expert reports pursuant to Rule 26(a)(2)(D)(ii)	March 22, 2027
Deadline to complete expert discovery	May 20, 2027
Deadline to file dispositive motions	August 18, 2027
Jointly proposed pretrial order	Within thirty (30) days after resolution of any summary judgment motions filed.
Filing settlement status reports	All parties and their counsel shall engage in good faith settlement talks no later than November 23, 2026. A Settlement Status Report shall be filed by December 21, 2026.
Final Pretrial Conference	To be determined
Trial Begins	To be determined

By agreement the Parties respectfully submit for the Court's consideration the attached Proposed Second Amended Scheduling Order.

Dated: November 5th, 2025

Respectfully submitted,

Plaintiff,
Estados Unidos Mexicanos
By its attorneys,

/s/ Ryan O'Neal (AZ # 031919)

Defendants,
Diamondback Shooting Sports, Inc., Loan
Prairie, LLC d/b/a The Hub, SNG Tactical,
LLC, Sprague's Sports, Inc., and Ammo
AZ, LLC
By their attorneys,

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CERTIFICATE OF SERVICE

I, Ryan O'Neal, hereby certify that this document was filed with the Clerk of the Court via CM/ECF. Those attorneys who are registered with the Court's electronic filing systems may access this filing through the Court's CM/ECF system, and notice of this filing will be sent to these parties by operation of the Court's electronic filings system.

Dated: November 5th, 2025

/s/Ryan O'Neal

Ryan O'Neal